

## REMARKS

### Summary of the Office Action

Claims 1-16 and 18 are considered in the Office action.

Claims 1-16 and 18 have been rejected under 35 U.S.C. § 112, first paragraph, as not enabled, because “the specification does not include a clear and concise written description of the process of converting a first file in a [sic] RDO format to a second file in a second format.”

Claims 1-16 and 18 have been rejected under 35 U.S.C. § 112, second paragraph, as indefinite, because “the scope of the invention cannot be determined because the second format is not ascertainable from the preamble of claim 1 nor from the body of claim 1.”

Claims 1-6, 9-14 and 18 have been rejected under 35 U.S.C. § 103(a) as obvious over LeGall et al. U.S. Patent No. 4,897,799 (“LeGall”) in view of Esbach et al. U.S. Patent No. 6,715,127 (“Esbach”).

Claims 7, 8 15 and 16 have been rejected under 35 U.S.C. § 103(a) as obvious over LeGall, Esbach and Chapman U.S. Patent Publication No. US 2002/0067498 (“Chapman”).

## REPLY

This application describes and claims methods and apparatus for converting a first file in a binary Raster Document Object (“RDO”) format, a proprietary file format by Xerox Corporation, to a second file in a second format. Despite this specificity, the Examiner has repeatedly rejected the claims of this invention based on references that have nothing whatsoever to do with the proprietary Xerox RDO format. For the following reasons, applicants respectfully submit that the claimed invention is allowable over the prior art, and meets the enablement and definiteness requirements of § 112.

## Section 112, First Paragraph Rejections

Claims 1-16 and 18 have been rejected under § 112, first paragraph, as not enabled, because “the specification does not include a clear and concise written description of the process of converting a first file in a [sic] RDO format to a second file in a second format.” Applicants respectfully disagree.

The specification describes methods and apparatus for converting a first file in a binary RDO format to a second file in a second format. The first file in the RDO format includes references to one or more page image files, and data that includes instructions for assembling the page image files into one or more document pages:

[T]he RDO format refers to a collection of files. Typically, there is a file with an “.rdo” file extension and a subdirectory of the same name, but with a “.con” extension. The subdirectory contains a series of TIFF files . . . which represent the actual page contents. Each page is stored as one or more TIFF image files, and the RDO file only contains the instructions of how to assemble the individual pages into the final document. For that purpose, RDO files contain the file names of all page image files and information on how to place the images onto a page, such as rotation, offsets, and margins. (Page 3, line 22 through page 4, line 3).

Thus, the first file in the RDO format includes references to one or more page image files (i.e., the file names of the page image files), and data that includes instructions for assembling the page image files into one or more document pages (i.e., the instructions of how to assemble the individual pages into the final document).

The specification further describes an exemplary process for converting the document pages of the first file to output pages of the second file:

The conversion process to PDF takes the steps illustrated in Fig. 1. In the first step, the binary RDO file 10 is read and analyzed 12. Its internal structure is decoded---parsed---and transferred into a data structure representation in memory.

In the second step, the data contained within the RDO file describing the arrangement of pages in the final document is extracted 14.

This step is separate due to the internal organization of the RDO file. The various pieces of data pertaining to different pages are scattered throughout the file and must be collected for each page in this step. In addition, there are some page-invariant data that apply to the entire document, such as header and footer messages, their location, or font selection.

Once all of these data are gathered, the output can be generated by placing the TIFF bitmap files 18 for each page onto the output page 16 and adding the optional text messages for header, footer and page number. When all pages have been processed in this way, the final PDF file 20 is self-contained and stored on disk. (Page 4, lines 9-24).

The remainder of the specification provides a very detailed description of an exemplary process for reading the first file, decoding the RDO format of the first file to identify the page assembly data, sorting the identified page assembly data on a document page basis, and placing the page image files for each document page on the associated output page according to the assembly instructions in the sorted data.

Indeed, the specification provides a detailed description of the organization of an RDO file, and exemplary steps for reading the first file. See Page 6, line 19 through Page 9, line 10; Page 12, line 1 through Page 28, line 27. Next, the specification describes exemplary steps for decoding the RDO format of the first file to identify the page assembly data, and sorting the identified page assembly data on a document page basis. See Page 9, line 11 through Page 11, line 8. Finally, the specification describes placing the page image files for each document page on the associated output page according to the assembly instructions in the sorted data. See Page 11, lines 9-17.

Because the specification adequately describes exemplary processes for converting a first file in an RDO format to a second file in a second format, applicants respectfully submit that the claims are enabled, and that the § 112, first paragraph rejections should be withdrawn.

### Section 112, Second Paragraph Rejections

Claims 1-16 and 18 have been rejected under § 112, second paragraph, as indefinite, because “the scope of the invention cannot be determined because the second format is not ascertainable from the preamble of claim 1 nor from the body of claim 1.” In particular, the Office actions states that “[i]t is difficult to determine if one or more of the following are [sic] comprise a second file in a second format: 1) page image files, (2) output page, (3) document pages.”

Applicants do not understand the basis of this rejection or the source of the Examiner’s confusion. As mentioned above, the first file in the RDO format includes references to one or more page image files, and data that includes instructions for assembling the page image files into one or more document pages. The second file is in a second format, and includes one or more output pages, with each output page associated with a corresponding document page. Applicants respectfully submit that the claims are not indefinite, and request that the § 112, second paragraph rejections should therefore be withdrawn.

### Reply to § 103 Rejections

Claims 1-6, 9-14 and 18 have been rejected under 35 U.S.C. § 103(a) as obvious over LeGall in view of Esbach, and claims 7, 8 15 and 16 have been rejected under 35 U.S.C. § 103(a) as obvious over LeGall, Esbach and Chapman. Independent claims 1 and 9 recite methods and apparatus for converting a first file in a binary RDO format (i.e., a proprietary file format by Xerox Corporation) to a second file in a second format. None of the cited references describe or suggest anything regarding converting files from an RDO format (i.e., a proprietary file format by Xerox Corporation) to a second file in a second format.

Indeed, as the Examiner concedes, LeGall is “silent regarding a [sic] RDO.” Hoping to fill that gap, the Examiner states that “Esbach discloses a [sic] RDO.” Applicants respectfully submit that LeGall and Esbach are irrelevant to the claimed invention. LeGall describes a method for transmitting visual information, such as the data comprising a raster display, from an originating system that uses a first native format to a receiving system that uses a second format native to it. (Col. 2, lines 15-20). Esbach describes a system and method for providing editing commands to a user of a

raster image, or portion of a raster image, to be edited. (Col. 1, lines 32-35). Neither reference describes or suggests anything regarding converting a first file in a binary RDO format (i.e., a proprietary file format by Xerox Corporation) to a second file in a second format.

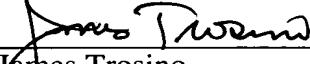
Applicants surmise that the Examiner apparently is confused by the inclusion of the name “Raster Document Object” in the claims. Indeed, the Examiner has repeatedly cited references that in some way disclose something about raster data processing, but do not disclose anything even vaguely related to the proprietary Xerox RDO format. Applicants respectfully submit that references that merely include the word “raster,” but that do not describe or suggest converting a first file in a binary RDO format (i.e., a proprietary file format by Xerox Corporation) to a second file in a second format, are irrelevant to the claimed invention.

Because the cited references do not describe or suggest the claimed invention, applicants respectfully request that the rejections of amended independent claims 1 and 9 be withdrawn. Because all other claims depend from claims 1 and 9, applicant respectfully requests that the rejections of claims 1-16 and 18 be withdrawn.

#### Conclusion

For the reasons stated above, applicants submit that this application, including claims 1-16 and 18, is allowable. Applicants therefore respectfully request that the Examiner allow this application.

Respectfully submitted,

  
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